

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-0036-RWS

JURY TRIAL DEMANDED

**JOINT MOTION SEEKING ENTRY OF ORDER FOCUSING PATENT CLAIMS AND
PRIOR ART TO REDUCE COSTS**

Pursuant to General Order No. 13-20, Plaintiff Maxell, Ltd. (“Maxell”) and Defendant Apple Inc. (“Apple”) (collectively, “the Parties”) hereby submit this Joint Motion Seeking Entry of Order Focusing Patent Claims and Prior Art to Reduce Costs (“Focusing Order”).

The Parties conferred yet failed to agree to several terms of the proposed Focusing Order relating to the total number of asserted claims and prior art references permitted at each phase, and relating to the treatment of independent claims when only a claim depending thereon has been asserted. These issues, and the Parties’ respective proposals, are designated in highlighting in the attached.

Dated: June 12, 2019

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 12th day of June, 2019, with a copy of this document via the Court's CM/ECF system.

/s/ Jamie B. Beaber